

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY JOHNSON	:	CIVIL ACTION
Plaintiff	:	
	:	
v.	:	NO.
	:	
CREDIT BUREAU COLLECTION	:	
SERVICES, INC. dba CBCS	:	
Defendant	:	JURY TRIAL DEMANDED

NOTICE OF REMOVAL

Defendant CREDIT BUREAU COLLECTION SERVICES, INC. dba CBCS (“CBCS” and/or “Defendant”), by its undersigned counsel, hereby petitions this Court as follows, pursuant to 28 U.S.C. § 1441(a):

1. CBCS is a defendant in an action pending in the Commonwealth of Pennsylvania, Court of Common Pleas of Lackawanna County, Case No. 20-cv-2516 (“the State Court Action”). A true and correct copy of the Complaint in the State Court Action is attached hereto as Exhibit “A”.

2. Plaintiff in the State Court Action is CINDY JOHNSON (“Plaintiff”).

See Exhibit “A”.

3. Plaintiff’s State Court Action alleges a violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

4. The State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1331, “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

5. Pursuant to 28 U.S.C. § 1441(a), “[a]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

6. Since this case arises out of an alleged violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, Defendant may properly remove the State Court Action based on 28 U.S.C. § 1441(a).

7. This Notice has been filed with the Court within thirty (30) days after purported service of the Complaint on Defendant on or about August 17, 2020.

WHEREFORE, Defendant CREDIT BUREAU COLLECTION SERVICES, INC. dba CBCS, prays that the State Court Action in Lackawanna County, Case No. 20-cv-2516, be removed to this Court for proper and just determination.

**KAUFMAN DOLOWICH & VOLUCK,
LLP**

By: /s/ Richard J. Perr
RICHARD J. PERR, ESQUIRE
MONICA M. LITTMAN, ESQUIRE
Four Penn Center
1600 John F. Kennedy Blvd., Suite 1030
Philadelphia, PA 19103
Telephone: (215) 501-7002
Facsimile: (215) 405-2973
rperr@kdvlaw.com
mlittman@kdvlaw.com
Attorneys for Defendant Credit Bureau
Collection Services, Inc. dba CBCS

Dated: September 10, 2020

CERTIFICATE OF SERVICE

I, RICHARD J. PERR, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically via the Court's CM/ECF system, email, and first class mail, postage prepaid:

Brett M. Freeman, Esquire
Sabatini Law Firm, LLC
216 North Blakely Street
Dunmore, PA 18512
brett@bankruptcypa.com
Attorney for Plaintiff

/S/ Richard J. Perr

RICHARD J. PERR, ESQUIRE

Dated: September 10, 2020

4829-0039-0858, v. 1